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'APR 7 1997

Federal Communications Commission
Office of Secretary

April 7, 1997

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** PENNSYLVANIA BAR ONLY
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Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: ✓ Oral And Written *Ex Parte* Notice — CS Docket 96-157
(Cable Pricing Flexibility)
Oral *Ex Parte* Notice - CS Docket No. 96-85 (Cable Act Reform)

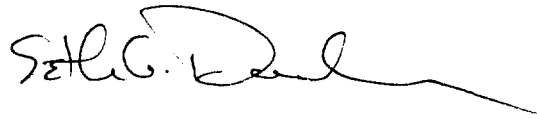
Dear Mr. Caton:

In accordance with Section 1.1200 *et seq.* of the Commission's rules, this is to provide notice that on Friday, April 4, 1997, Seth Davidson of the law firm Fleischman and Walsh, L.L.P., met with Anita Wallgren, legal advisor to Commissioner Ness to discuss issues relating to the Commission's pending proceeding concerning cable pricing flexibility. Attached is a copy of an unopposed Petition for Special Relief illustrating an example of flexible pricing which was left with Ms. Wallgren. In addition, Mr. Davidson discussed issues relating to the implementation of the MDU pricing flexibility provisions of the 1996 Telecommunications Act, including the need for the Commission to adopt rules providing cable operators with the MDU pricing flexibility intended by Congress.

Mr. William F. Caton
April 7, 1997
Page 2

An original and two copies of this letter are being filed for inclusion in the record of each of the proceedings referenced above. In addition, a copy of this *ex parte* notice was delivered to Ms. Wallgren on April 7, 1997.

Very truly yours,

A handwritten signature in black ink, appearing to read "Seth A. Davidson", with a long horizontal flourish extending to the right.

Seth A. Davidson

Enclosure

cc: A. Wallgren

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of)
)
MEREDITH/NEW HERITAGE STRATEGIC)
PARTNERS, L.P.)

PETITION FOR SPECIAL RELIEF

Meredith/New Heritage Strategic Partners, L.P. ("Meredith"), franchised operator of cable systems serving a number of communities in the vicinity of Minneapolis/St. Paul, Minnesota, hereby petitions for a waiver of the Commission's rules insofar as those rules would require Meredith to adjust its rates to reflect the movement of channels from the cable programming services tier ("CPST") to the basic services tier ("BST") and/or prevent Meredith from shifting certain permitted increases in BST rates to the CPST charge on a revenue-neutral basis. As discussed more fully below, the requested relief, which has been endorsed by the relevant local franchising authorities, will serve the public interest.

BACKGROUND

The instant petition relates to six cable systems operated by Meredith in the Minneapolis/St. Paul, Minnesota suburbs.¹ Towards the end of 1995, Meredith proposed to

¹The six systems are: **Burnsville/Eagan** (MN0439, MN0440); **Columbia Heights/Hilltop** (MN0232, MN0233); **North Central Suburbs** (MN0370 through MN0378); **Quad Cities** (MN0362 through MN0365); **Ramsey/Washington** (MN0313 through MN0324 and MN0335).

restructure its service offerings in these systems by moving several channels previously offered only to CPST customers to the BST.² The goal of this between-tier channel shift was to enhance the value of the BST.

While the relevant local franchising authorities were supportive of Meredith's proposed restructuring, they expressed concern as to whether the accompanying rate adjustments, including adjustments resulting directly from the between-tier channel shift, would largely negate the benefits of the change to BST-only customers. For example, under Section 76.922(e)(5) of the Commission's rules and the related FCC Form 1210 methodology, cable operators that shift channels from a CPST to the BST are directed to reduce the price of the CPST to reflect the programming costs and residual associated with the shifted channels. The residual, adjusted on a revenue neutral basis to reflect tier penetration differentials, plus the programming cost associated with the shifted channels, may then be added to the BST. In Meredith's case, the effect of these adjustments would have been a significant increase (exceeding 20 percent) in the rate charged to BST-only customers; the combined rate paid by customers who took both the BST and the CPST (and who would be receiving the same services as before) would have remained essentially unchanged.³

²Meredith proposed moving eight CPST channels to the BSTs in Burnsville/Eagan and North Central and six channels in the other systems.

³The extent to which the combined BST/CPST rate would differ following a between-tier channel shift rate adjustment varies inversely with the CPST penetration level (*i.e.*, higher CPST penetration levels produce smaller reductions in the combined BST/CPST rate). In Meredith's case, the CPST penetration levels on the systems herein at issue ranged from 97.6 percent to 95.6 percent; as a result, there would only have been a *de minimis* reduction in the combined BST/CPST rate after the between channel shift. See Exhibit A.

After discussions with the relevant local franchising authorities, Meredith went ahead with its proposed restructuring, but did not change its BST and CPST rates to reflect the movement of channels from the CPST to the BST.⁴ This decision has been expressly endorsed by each of the local franchising authorities.⁵ Meredith herein seeks a waiver of the Commission's rules to allow it to continue to price its CPST at a higher level than would be calculated under the Commission's rules, but at a level that is revenue-neutral (*vis-a-vis* the BST rate).⁶

DISCUSSION

Grant of the requested waiver clearly will serve the public interest. Meredith's decision not to adjust its rates to reflect its between-tier channel shift avoided a significant increase in BST-only rates and was revenue-neutral as to the cable operator. Moreover, Meredith's decision has been endorsed by all of the relevant local franchising authorities and

⁴Indeed, Meredith did not change its BST rates at all. Thus, in addition to the amount that was not shifted to the BST to reflect the between-tier channel shift, the CPST also includes an amount, adjusted on a revenue-neutral basis, equal to other external increases in the BST to which Meredith would have been entitled in its most recent Form 1210. Meredith's waiver request encompasses this portion of its rate as well.

⁵See Exhibit B for copies of resolutions adopted by the local franchising authorities regarding Meredith's BST and CPST pricing. Subsequent to the adoption of these resolutions, each local franchising authority reviewed and approved Meredith's Form 1210 which calculates BST rates in accordance with the Commission's rules. See Exhibit C.

⁶Meredith notes that the Cable Services Bureau has reviewed the CPST rates of each of the systems covered by this waiver through May 14, 1994; Meredith's Forms 1200 are pending review. The only one of the systems covered by this waiver request that is the subject of a current Form 329 complaint is Ramsey/Washington. Meredith submitted a Form 1210 in response to that complaint in February 1996. Meredith also has submitted Forms 1210 for each of the other systems pursuant to Section 76.958 of the Commission's rules. All of these forms adjust the CPST rate to reflect the inclusion in the CPST of other BST-related externals.

comports with previous statements by the Commission acknowledging the public benefits of revenue-neutral BST and CPST pricing adjustments.

First, as discussed above, Meredith has sought to enhance the BST in several of its systems by adding to it a number of services previously available only to CPST customers. Strict enforcement of the Commission's rules relating to between-tier channel shifts would have led to a significant increase in BST rates, thereby undermining the benefit of the service restructuring. In contrast, grant of the requested waiver not only will benefit BST-only customers (both current and future), but will do so in a way that is revenue-neutral as to Meredith and leaves BST/CPST customers paying essentially what they would otherwise have paid for the same amount of service.

Second, and of enormous significance, Meredith's decision not to adjust its rates to reflect the between-tier channel shift has been endorsed by all of the relevant local franchising authorities.⁷ Furthermore, the Commission itself recently released for comment a "pricing flexibility" proposal that recognizes the public benefit that can follow from allowing cable operators to make revenue neutral adjustments to BST and CPST rates.⁸ Permitting Meredith to shift CPST services to the BST without adjusting its BST and CPST rates is merely a variation on this pricing flexibility proposal.⁹

⁷See Exhibits B and C.

⁸Memorandum Opinion and Order and Notice of Proposed Rulemaking, MM Docket 92-266, CS Docket 96-157, FCC 96-316 (rel. Aug. 15, 1996) at ¶¶ 15-17.

⁹The pricing approach that is the subject of the instant petition also is similar in concept to the "lifeline" tier approach that the Commission has approved in the context of certain "social contract" rulings. See Social Contract for Time Warner Cable, FCC 95-477 (rel.

CONCLUSION

For the reasons stated above, Meredith submits that the Commission should grant its petition for special relief.

Respectfully submitted,

MEREDITH/NEW HERITAGE STRATEGIC
PARTNERS, L.P.



Seth A. Davidson

Fleischman and Walsh, L.L.P.
1400 16th Street, NW, Suite 600
Washington, DC 20036
202/939-7900

Its Attorneys

Dated: October 4, 1996

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⁹(...continued)

Nov. 30, 1995) at ¶ 56 ("lifeline" BST provides "valuable public benefits"); Social Contract for Continental Cablevision, FCC 95-335 (rel. Aug. 3, 1995) at ¶ 48 (accord).

EXHIBIT A

EXHIBIT A

COMPARISON OF FCC FORM 1210 AND IMPLEMENTED RATES

<u>System</u>	<u>Form 1210</u>	<u>Implemented</u>
Burnsville/Eagan	BST: 10.42 CPST: <u>12.38</u> 22.80	BST: 7.77 CPST: <u>15.14</u> 22.91
Columbia Heights	BST: 9.49 CPST: <u>12.52</u> 22.01	BST: 7.85 CPST: <u>14.21</u> 22.06
North Central	BST: 10.28 CPST: <u>12.19</u> 22.47	BST: 7.64 CPST: <u>14.93</u> 22.57
North Suburbs	BST: 10.49 CPST: <u>12.21</u> 22.70	BST: 8.56 CPST: <u>14.26</u> 22.77
Quad Cities	BST: 9.55 CPST: <u>12.21</u> 22.11	BST: 7.90 CPST: <u>14.21</u> 22.16
Ramsey/Washington	BST: 10.59 CPST: <u>12.43</u> 23.02	BST: 8.62 CPST: <u>14.46</u> 23.08

EXHIBIT B

ORDER

REGARDING THE REVIEW OF FORM 1210 SUBMITTED BY MEREDITH CABLE COMPANY ON OCTOBER 24, 1995

WHEREAS, the Burnsville-Eagan Cable Communications Commission (hereinafter the "Commission") is certified as a rate regulatory authority pursuant to the rules of the Federal Communications Commission (hereinafter "FCC"),

WHEREAS, the Commission has notified Meredith Cable Company (hereinafter "Company") that the Company is subject to the rate regulatory authority of the Commission,

WHEREAS, the Commission has received from the Company a FCC Form 1210 dated October 19, 1995, calculating an increase in the Company's maximum permitted rate for Basic service as of January 1, 1996 from \$7.77 to \$10.42,

WHEREAS, the Commission has determined that it needs additional time to solicit, receive, and analyze additional information related to the review of the Company's FCC Form 1210,

WHEREAS, the Company has informed the Commission that it will not increase its Basic service rate from the current level of \$7.77 to the maximum permitted level reflected on its Form 1210, subject to the FCC allowing the Company, effective January 1, 1996, to shift the amount of the increase in the Basic service rate to the Preferred service tier on a revenue neutral basis,

WHEREAS, the Commission supports the Company in its effort to obtain approval of its Preferred service rate from the FCC, and will not issue a Form 329 complaint against the Company with respect to the Preferred service rate implemented January 1, 1996,

NOW, THEREFORE, IT IS HEREBY ORDERED by the Commission that the initial thirty-day (30) period for the review of the Company's FCC Form 1210 is tolled for an additional ninety (90) days.

FURTHER, for the purpose of calculating the amount of the increase in the maximum permitted Basic service rate to be shifted to the Preferred service tier, the Commission tentatively approves the Company's FCC Form 1210, with the understanding that, in the event the Commission's subsequent analysis of FCC Form 1210 requires a downward reduction in the calculation of the maximum permitted Basic service rate, the Company will be required to make such rate adjustments and refunds as are appropriate.

FURTHER, that in the event the FCC does not allow the Company to shift the increase in the maximum permitted Basic service rate to the Preferred service rate, the Company may implement the Basic service rate, as approved by the Commission, concurrent with the implementation of the reduction in the Preferred service rate ordered by the FCC, and may offset any refunds ordered by the FCC against the difference between the Basic service rate charged during the period covered by the refund order and the maximum permitted Basic rate, as approved by the Commission.

FURTHER, that this Order shall be effective immediately, however, the tolling period shall not begin the expiration of the initial thirty (30) day period.

ORDERED THIS 14th DAY OF NOVEMBER, 1995.

BURNSVILLE-EAGAN CABLE
COMMUNICATIONS COMMISSION

By 
Its CHAIR

ORDER

**REGARDING THE REVIEW OF FORM 1210 SUBMITTED
BY MEREDITH CABLE COMPANY ON OCTOBER 24, 1995**

WHEREAS, the City of Columbia Heights (hereinafter the "City") is certified as a rate regulatory authority pursuant to rules of the Federal Communications Commission (hereinafter "FCC"),

WHEREAS, the City has notified Meredith Cable Company (hereinafter "Company") that the Company is subject to the rate regulatory authority of the City,

WHEREAS, the City has received from the Company a FCC Form 1210, received October 24, 1995, calculating an increase in the Company's maximum permitted rate for Basic service as of January 1, 1996, from \$7.85 to \$9.49,

WHEREAS, the City has determined that it needs additional time to solicit, receive, and analyze additional information related to the review of the Company's FCC Form 1210,

WHEREAS, the Company has since informed the City that it will not increase its Basic service rate from the current level of \$7.85 to the maximum permitted level reflected on its Form 1210, subject to the FCC allowing the Company, effective January 1, 1996, to shift the amount of the increase in the Basic service rate to the Preferred service tier on a revenue neutral basis,

WHEREAS, the City supports the company in its effort to obtain approval of its Preferred service rate from the FCC, and will not issue a Form 329 complaint against the Company with respect to the Preferred service rate implemented January 1, 1996,

NOW, THEREFORE, IT IS HEREBY ORDERED by the City that the initial thirty (30) day period for the review of the Company's FCC Form 1210 is tolled for an additional ninety (90) days.

FURTHER, for the purpose of calculating the amount of the increase in the maximum permitted Basic service rate to be shifted to the Preferred service tier, the City tentatively approves the Company's FCC Form 1210, with the understanding that, in the event the City's subsequent analysis of FCC Form 1210 requires a downward reduction in the calculation of the maximum permitted Basic service rate, the Company will be required to make such rate adjustments and refunds as are appropriate.

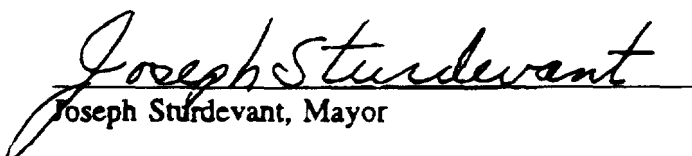
FURTHER, that in the event the FCC does not allow the Company to shift the increase in the maximum permitted Basic service rate to the Preferred service rate, the Company may implement the Basic service rate, as approved by the City, concurrent with the implementation of the reduction in the Preferred service rate ordered by the FCC, and may offset any refunds ordered by the FCC against the difference between the Basic service rate charged during the period covered by the refund order and the maximum permitted Basic rate, as approved by the City.


FURTHER, that this Order shall be effective immediately, however, the tolling period shall not begin until after the expiration of the initial thirty (30) day period.

ORDERED THIS 13TH DAY OF NOVEMBER, 1995.

Offered by: Peterson
Seconded by; Petkoff
Roll call: All Ayes

CITY OF COLUMBLA HEIGHTS


Joseph Sturdevant, Mayor


Jo-Anne Student, Council Secretary

ORDER

REGARDING THE REVIEW OF FORM 1210 SUBMITTED BY MEREDITH CABLE COMPANY ON OCTOBER 24, 1995

WHEREAS, the North Central Suburban Cable Communications Commission (hereinafter the "Commission") is certified as a rate regulatory authority pursuant to the rules of the Federal Communications Commission (hereinafter "FCC"),

WHEREAS, the Commission has notified Meredith Cable Company (hereinafter "Company") that the Company is subject to the rate regulatory authority of the Commission,

WHEREAS, the Commission has received from the Company a FCC Form 1210 dated October 19, 1995, calculating an increase in the Company's maximum permitted rate for Basic service as of January 1, 1996 from \$7.64 to \$10.28,

WHEREAS, the Commission has determined that it needs additional time to solicit, receive, and analyze additional information related to the review of the Company's FCC Form 1210,

WHEREAS, the Company has informed the Commission that it will not increase its Basic service rate from the current level of \$7.64 to the maximum permitted level reflected on its Form 1210, subject to the FCC allowing the Company, effective January 1, 1996, to shift the amount of the increase in the Basic service rate to the Preferred service tier on a revenue neutral basis,

WHEREAS, the Commission supports the Company in its effort to obtain approval of its Preferred service rate from the FCC, and will not issue a Form 329 complaint against the Company with respect to the Preferred service rate implemented January 1, 1996,

NOW, THEREFORE, IT IS HEREBY ORDERED by the Commission that the initial thirty-day (30) period for the review of the Company's FCC Form 1210 is tolled for an additional ninety (90) days.

FURTHER, for the purpose of calculating the amount of the increase in the maximum permitted Basic service rate to be shifted to the Preferred service tier, the Commission tentatively approves the Company's FCC Form 1210, with the understanding that, in the event the Commission's subsequent analysis of FCC Form 1210 requires a downward reduction in the calculation of the maximum permitted Basic service rate, the Company will be required to make such rate adjustments and refunds as are appropriate.

FURTHER, that in the event the FCC does not allow the Company to shift the increase in the maximum permitted Basic service rate to the Preferred service rate, the Company may implement the Basic service rate, as approved by the Commission, concurrent with the implementation of the reduction in the Preferred service rate ordered by the FCC, and may offset any refunds ordered by the FCC against the difference between the Basic service rate charged during the period covered by the refund order and the maximum permitted Basic rate, as approved by the Commission.

FURTHER, that this Order shall be effective immediately, however, the tolling period shall not begin the expiration of the initial thirty (30) day period.

ORDERED THIS 15th DAY OF NOVEMBER, 1995.

NORTH CENTRAL SUBURBAN CABLE
COMMUNICATIONS COMMISSION

By Harley Wells
Its Chair

ORDER

REGARDING THE REVIEW OF FORM 1210 SUBMITTED BY MEREDITH CABLE COMPANY ON OCTOBER 24, 1995

WHEREAS, the North Suburban Cable Communications Commission (hereinafter the "Commission") is certified as a rate regulatory authority pursuant to the rules of the Federal Communications Commission (hereinafter "FCC"),

WHEREAS, the Commission has notified Meredith Cable Company (hereinafter "Company") that the Company is subject to the rate regulatory authority of the Commission,

WHEREAS, the Commission has received from the Company a FCC Form 1210 dated October 19, 1995, calculating an increase in the Company's maximum permitted rate for Basic service as of January 1, 1996 from \$8.56 to \$10.49,

WHEREAS, the Commission has determined that it needs additional time to solicit, receive, and analyze additional information related to the review of the Company's FCC Form 1210,

WHEREAS, the Company has informed the Commission that it will not increase its Basic service rate from the current level of \$8.56 to the maximum permitted level reflected on its Form 1210, subject to the FCC allowing the Company, effective January 1, 1996, to shift the amount of the increase in the Basic service rate to the Preferred service tier on a revenue neutral basis,

WHEREAS, the Commission supports the Company in its effort to obtain approval of its Preferred service rate from the FCC, and will not issue a Form 329 complaint against the Company with respect to the Preferred service rate implemented January 1, 1996,

NOW, THEREFORE, IT IS HEREBY ORDERED by the Commission that the initial thirty-day (30) period for the review of the Company's FCC Form 1210 is tolled for an additional ninety (90) days.

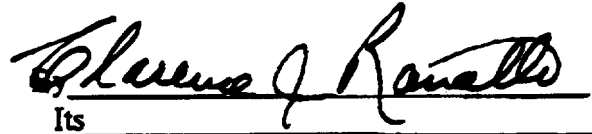
FURTHER, for the purpose of calculating the amount of the increase in the maximum permitted Basic service rate to be shifted to the Preferred service tier, the Commission tentatively approves the Company's FCC Form 1210, with the understanding that, in the event the Commission's subsequent analysis of FCC Form 1210 requires a downward reduction in the calculation of the maximum permitted Basic service rate, the Company will be required to make such rate adjustments and refunds as are appropriate.

FURTHER, that in the event the FCC does not allow the Company to shift the increase in the maximum permitted Basic service rate to the Preferred service rate, the Company may implement the Basic service rate, as approved by the Commission, concurrent with the implementation of the reduction in the Preferred service rate ordered by the FCC, and may offset any refunds ordered by the FCC against the difference between the Basic service rate charged during the period covered by the refund order and the maximum permitted Basic rate, as approved by the Commission.

FURTHER, that this Order shall be effective immediately, however, the tolling period shall not begin the expiration of the initial thirty (30) day period.

ORDERED THIS 2ND DAY OF NOVEMBER, 1995.

NORTH SUBURBAN CABLE
COMMUNICATIONS COMMISSION


Its _____

ORDER

**REGARDING THE REVIEW OF FORM 1210 SUBMITTED
BY MEREDITH CABLE COMPANY ON OCTOBER 24, 1995**

WHEREAS, the Quad Cities Cable Communications Commission (hereinafter the "Commission") is certified as a rate regulatory authority pursuant to the rules of the Federal Communications Commission (hereinafter "FCC"),

WHEREAS, the Commission has notified Meredith Cable Company (hereinafter "Company") that the Company is subject to the rate regulatory authority of the Commission,

WHEREAS, the Commission has received from the Company a FCC Form 1210 dated October 19, 1995, calculating an increase in the Company's maximum permitted rate for Basic service as of January 1, 1996 from \$7.90 to \$9.55,

WHEREAS, the Commission has determined that it needs additional time to solicit, receive, and analyze additional information related to the review of the Company's FCC Form 1210,

WHEREAS, the Company has informed the Commission that it will not increase its Basic service rate from the current level of \$7.90 to the maximum permitted level reflected on its Form 1210, subject to the FCC allowing the Company, effective January 1, 1996, to shift the amount of the increase in the Basic service rate to the Preferred service tier on a revenue neutral basis,

WHEREAS, the Commission supports the Company in its effort to obtain approval of its Preferred service rate from the FCC, and will not issue a Form 329 complaint against the Company with respect to the Preferred service rate implemented January 1, 1996,

NOW, THEREFORE, IT IS HEREBY ORDERED by the Commission that the initial thirty-day (30) period for the review of the Company's FCC Form 1210 is tolled for an additional ninety (90) days.

FURTHER, for the purpose of calculating the amount of the increase in the maximum permitted Basic service rate to be shifted to the Preferred service tier, the Commission tentatively approves the Company's FCC Form 1210, with the understanding that, in the event the Commission's subsequent analysis of FCC Form 1210 requires a downward reduction in the calculation of the maximum permitted Basic service rate, the Company will be required to make such rate adjustments and refunds as are appropriate.

FURTHER, that in the event the FCC does not allow the Company to shift the increase in the maximum permitted Basic service rate to the Preferred service rate, the Company may implement the Basic service rate, as approved by the Commission, concurrent with the implementation of the reduction in the Preferred service rate ordered by the FCC, and may offset any refunds ordered by the FCC against the difference between the Basic service rate charged during the period covered by the refund order and the maximum permitted Basic rate, as approved by the Commission.

FURTHER, that this Order shall be effective immediately, however, the tolling period shall not begin the expiration of the initial thirty (30) day period.

ORDERED THIS 16 DAY OF NOVEMBER, 1995.

QUAD CITIES CABLE COMMUNICATIONS
COMMISSION

By *Quinn M. Cotton*
Its CHAIR

ORDER

REGARDING THE REVIEW OF FORM 1210 SUBMITTED BY MEREDITH CABLE COMPANY ON OCTOBER 24, 1995

WHEREAS, the Ramsey/Washington Counties Suburban Cable Communications Commission (hereinafter "Commission") is certified as a rate regulatory authority pursuant to the rules of the Federal Communications Commission (hereinafter "FCC");

WHEREAS, the Commission has notified Meredith Cable Company (hereinafter "Company") that the Company is subject to the rate regulatory authority of the Commission;

WHEREAS, the Commission has received from the Company a FCC Form 1210 dated October 19, 1995, calculating an increase in the Company's maximum permitted rate for Basic service as of January 1, 1996 from \$8.62 to \$10.59;

WHEREAS, the Commission has determined that it needs additional time to solicit, receive, and analyze additional information related to the review of the Company's FCC Form 1210;

WHEREAS, the Company has informed the Commission that it will not increase its Basic service rate from the current level of \$8.62 to the maximum permitted level reflected on its Form 1210, subject to the FCC allowing the Company, effective January 1, 1996, to shift the amount of the increase in the Basic service rate to the Preferred service tier on a revenue neutral basis;

WHEREAS, the Commission supports the Company in its effort to obtain approval of its Preferred service rate from the FCC, and will not issue a Form 329 complaint against the Company with respect to the Preferred service rate implemented January 1, 1996;

NOW, THEREFORE, IT IS HEREBY ORDERED by the Commission that the initial thirty-day period for the review of the Company's FCC Form 1210 is tolled for an additional ninety (90) days.

FURTHER, for the purpose of calculating the amount of the increase in the maximum permitted Basic service rate to be shifted to the Preferred service tier, the Commission tentatively approves the Company's FCC Form 1210, with the understanding that, in the event the Commission's subsequent analysis of FCC Form 1210 requires a downward reduction in the calculation of the maximum permitted Basic service rate, the Company will be required to make such rate adjustments and refunds as are appropriate;

FURTHER, that in the event the FCC does not allow the Company to shift the increase in the maximum permitted Basic service rate to the Preferred service rate, the Company may implement the Basic service rate ordered by the FCC concurrent with the implementation of the reduction in the Preferred service rate and may offset

any refunds ordered by the FCC against the difference between the Basic service rate charged during the period covered by the refund order and the maximum permitted Basic rate, as approved by the Commission;

FURTHER, that this Order shall be effective immediately, however, the tolling period shall not begin the expiration of the initial thirty (30) day period.

ORDERED THIS 9th DAY OF NOVEMBER 1995.

RAMSEY WASHINGTON COUNTIES SUBURBAN
CABLE COMMUNICATIONS COMMISSION

By: _____

Its: _____

EXHIBIT C

ORDER

**Regarding Approval of the
Proposed Rate Increase Submitted by Meredith Cable Company
to the Burnsville-Eagan Cable Communications Commission**

WHEREAS, the Burnsville-Eagan Cable Communications Commission (hereinafter "Commission") is certified as a rate regulatory authority pursuant to rules of the Federal Communications Commission (hereinafter "FCC"),

WHEREAS, the Commission has notified Meredith Cable Company (hereinafter "Company") that the Company is subject to the rate regulatory authority of the Commission,

WHEREAS, the Commission has received from the Company an FCC Form 1205 Equipment Rate Form and an FCC Form 1210 "Update Form",

WHEREAS, the Form filings implicate the Commission's authority to regulate basic service rates in requesting an increase in the Company's maximum permitted basic service rate and related equipment rates, on a going forward basis,

WHEREAS, the Commission has reviewed the Form filings in accordance with applicable FCC rules and regulations and has consulted with experts, including legal and accounting experts,

WHEREAS, the Commission solicited, received and analyzed additional information related to said review by the Commission, staff and consultants,


WHEREAS, the Commission, its staff and consultants, have determined that the Company's FCC Form 1205 and 1210 comport with applicable FCC rules and regulations,

NOW, THEREFORE, IT IS HEREBY ORDERED by the Burnsville-Eagan Cable Communications Commission that the proposed rate increases, as filed, for the basic service tier and related equipment are reasonable and approved, subject, as may be necessary, to such further review of the implementation of the proposed rate increase on the cable programming service tier.

FURTHER, that this Order shall be effective immediately.

ORDERED THIS 14th DAY OF DECEMBER, 199 5.

Burnsville-Eagan Cable Communications
Commission



By Gail B. Baker

ORDER

REGARDING APPROVAL OF THE
PROPOSED RATE INCREASE SUBMITTED BY MEREDITH CABLE COMPANY
TO THE CITY OF COLUMBIA HEIGHTS

WHEREAS, the City of Columbia Heights (hereinafter "City") is certified as a rate regulatory authority pursuant to rules of the Federal Communications Commission (hereinafter "FCC"),

WHEREAS, the City has notified Meredith Cable Company (hereinafter "Company") that the Company is subject to the rate regulatory authority of the Commission,

WHEREAS, the City has received from the Company an FCC Form 1205, Equipment Rate Form and an FCC Form 1210, "Update Form",

WHEREAS, the Form Filings implicate the City's authority to regulate basic service rates in requesting an increase in the Company's maximum permitted basic service rate and related equipment rates, on a going forward basis,

WHEREAS, the City has reviewed the Form filings in accordance with applicable FCC rules and regulations and has consulted with experts, including legal and accounting experts,

WHEREAS, the City solicited, received and analyzed additional information related to said review by the City, staff, and consultants,


WHEREAS, the City, its staff and consultants, have determined that the Company's FCC Form 1205 and 1210 comply with applicable FCC rules and regulations,

NOW, THEREFORE, IT IS HEREBY ORDERED by the City of Columbia Heights that the proposed rate increases, as filed, for the basic service tier and related equipment are reasonable and approved, subject as may be necessary, to such further review of the implementation of the proposed rate increase on the cable programming service tier.

FURTHER, that this Order shall be effective immediately.

ORDERED THIS 22nd DAY OF January, 1996.


Joseph Sturdevant, Mayor


Jo-Anne Student, Council Secretary